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April 4, 2008

By Hand Delivery

Gary Trachten, Esq.
Kudman Trachten Aloe LLP
350 Fifth Avenue, Suite 4400
New York, NY 10118

Re: Samuel Judd v. Take-Two Interactive Software, Inc., No. 07 Civ. 7932 (GEL) (HP)

Dear Gary:

Pursuant to our executed Stipulation and Order of Confidentiality ("Stipulation"), Defendant supplements its original production and encloses the following documents herewith:

- Personnel Files of Defendant's Rule 26 designated knowledgeable persons, Bates-stamped Confidential D 001051- D 002133, responsive to Document Requests 1, 6, 23, 25, 26.
- FY 2006 Compensation Recommendations, Bates-stamped Confidential D 002134, responsive to Document Requests 2, 5, 9, 26.
- Compensation and other financial tables illustrating: (1) Current Global HC/Employee Data; (2) 20 Highest Paid Employees by Region; (3) FY06 Bonus Increases; (4) Employees Paid More Than 200K; (5) T2 Execs Target Bonuses, Bates-stamped Confidential D 002135- D 002187, responsive to Document Requests 2, 5, 9, 26.
- Minutes of the Take-Two Board of Directors' meetings, and minutes of the meetings of the Compensation Committee from 2004-2007, Bates-stamped Confidential D 002198- D 002871, responsive to Document Requests 2, 5, 6, 9, 11, 26, 27.
- FY 2004 Executive Compensation tables, FY 2004 Stock Option and Restricted Stock Grants, and FY 2004 Compensation Report, Bates-stamped Confidential D 002188- D 002197, responsive to Document Requests 2, 6, 9, 26.

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With respect to e-discovery, as a result of our initial review of approximately 30,000 emails, Defendant is revising its search terms as follows in an effort to exclude the review of voluminous, irrelevant materials:

- target! – revised as “target! /3 comp!” or “target! /3 bonus!” or “target! /3 perf!”
- org! chart! – revised as “org! chart!”

Sincerely,



Ian C. Schaefer

Enclosures

cc: Kathleen M. McKenna, Esq.
Thomas A. McKinney, Esq.
Christopher Casazza, Esq.